

DECC Severn Tidal Power Consultation

Responses for action@greenworldtrust.org.uk

General Questions

Q1. Is the Feasibility Study taking the right issues into account?

No, because (1) the Minehead-Aberthaw reef is the only viable location and system you've looked at (2) there are viable schemes being developed that you have not even looked at (3) tidal energy harvesting is untried in ALL its forms, therefore a lot more money and focus should go towards research & development (4) there are serious problems with all the shortlisted systems, of which the biggest are silting and environmental disruption

Q2. Are there other aspects or other evidence that should be taken into consideration?

Yes (1) the Atkins Report regarding the feasibility of the reef system (2) the economic effect of very limited times of delivery of electricity of all the barrages (3) silting effects with all your preferred designs (4) the huge "long tail" of disastrous effects on local life & tourism (5) important evidence and technology is coming to light all the time, and there must be room to consider these ongoing factors. (6) to this end, we have a Forum for discussion on our website, and we would like this or an equivalent forum publicised by yourselves

Q3. Have we given due weighting to the different benefits and impacts under consideration in our analysis?

No (1) the nuclear energy figures alongside the others are highly suspect. We believe that people voting on the strength of your figures would be voting on false premises. The source for such estimates should be transparent and checkable. (2) to this, add all the points made in Q1 and Q2

Q4. Do you think that it is better to wait for new and less environmentally damaging technologies to be developed, or for economic conditions to improve, or to move ahead more quickly with available proposals?

None of the above. New and less environmentally damaging technologies are already available and should be supported with research and development. These include at the very least (1) the reef proposal (R1) (2) "Third Generation" tidal stream turbines for slow-flowing water (3) Buoyancy Harvesters

Chapter 3a - Issues - Regional Economic Impacts

Q5. Do you agree with the conclusions of the DTZ study and are there any other factors that the Feasibility Study should be aware of?

No At two recent meetings of local business people, they were incensed that the barrage (B1) proposal was even being considered because of the costs of (1) silting, (2) interruption to shipping, (3) the dangers of major flooding to 30% of Somerset, (4) environmental impact, and (5) the disastrous effects on the tourist industry. Your DTZ study does not convince anybody. People need something they can trust. This requires an ongoing Forum for discussion. Please consider either backing ours or setting up a Forum of your own. The consensus of opinion that we have seen favours the Reef (R1). People are much more in favour of much less invasive technologies which are potentially far more economic than the Parsons Brinkerhoff study indicates.

Chapter 3b - Issues - Financing, Ownership and Subsidy Mechanisms

Q6. Do you agree with PwC's analysis on ownership and delivery of a Severn scheme?

Not applicable because all the current favoured schemes are unsuitable and unacceptable to people.

Q7. Are there any other options for delivery or subsidy that should be considered? Would they be appropriate for all of the tidal power options under consideration?

Not relevant until you start to consider other better tidal power schemes. Until then, any more consideration of delivery options is a waste of time.

Q8. Government believes that the private sector is best placed to design, build and operate a Severn tidal scheme. Government's role would be to set the conditions in which a scheme could come forward. Do you agree?

What is needed is Government support for research and development of promising new technologies already in existence ie (1) tidal reef (2) Third Generation tidal stream turbines (3) other possibilities. Only then would private financing be appropriate to consider.

Chapter 3c - Issues - Energy Markets

Q9. What are the impacts and potential risks of tidal intermittency on supply / demand balancing and the energy market?

Intermittency problems put all the barrage proposals out of the running. With the Reef, using orthogonal turbines on both ebb and flood, with longer running times in both ebb and flood, there is far less interruption, and management with backup becomes feasible.

Q10. Is it worth considering exploring the option of demand management?

Well worth exploring, if we are entering a whole new era of intermittent energy sources, so long as this is not seen as a substitute for the exploration of renewable resources.

Q11. Do you consider that a Severn tidal scheme could impact on investment in other energy supply capacity, and if so in what ways?

Yes - but only if you concentrate on developing ideas that are actually workable. (1) engineering exports - in particular, the Third Generation tidal stream systems and other modular forms of tidal energy harnessing. (2) electricity exports - the UK tidal resources are phenomenal.

Chapter 4a - Assessment of Tidal Options - Methodology and Conclusions

Q12. Do you agree with the factors that have been used to determine the short-list for further study?

No - The factors are more or less adequate for the time being, but we disagree with the shortlist.

Q13. Do you agree that the test of economic feasibility should be relative to the cost of other renewables?

Yes, so long as the following are taken into account (1) the intermittency of supply (2) cradle-to-grave costs (3) total impact on everything else

Q14. Do you have any further comments on PB's Options Appraisal Report? Please support your response with evidence where possible.

We are concerned that the whole assessment exercise is just a way to disprove all options so that the nuclear option can be slid in. We are not convinced that your survey is neutral.

Chapter 4b - Assessment of Tidal Options - Short-list of Schemes

Q15. Do you agree that the two lagoon options selected for further study represent a good basis for studying the lagoons?

Irrelevant. Lagoons would only be useful in tandem with the Reef, and there are better places outside the Bristol Channel to site lagoons.

Q16. Given the short-listing criteria, are there any proposals on the short-list which are not suitable? Please support your response with evidence where appropriate.

We do not trust Parsons Brinckerhoff's shortlisting criteria. (1) its figures are at odds with figures from the Atkins report, which estimate the reef as economically feasible. (2) criticism levelled at the Reef technology is laughable compared with the naive designs of the ever-changing barrage (B1) turbines. (3) How the costs are estimated is not stated transparently. The nuclear figure is highly suspect and utterly at odds with Michael Meacher's statement that nuclear energy is twice the cost of wind and four times the cost of gas. (4) we could identify these issues: this makes us mistrustful of all the criteria

Q17. Does the shortlist represent an appropriate level of ambition given the energy potential of the Estuary?

No. (1) only the Reef between Minehead and Aberthaw is feasible as a joined-up scheme (2) none of the shortlisted schemes are workable. (3) but workable modular schemes are in the pipeline, that can be sited one at a time and perfected over time while running. These systems need support for development as they provide a huge future resource. The cost of development will pay for itself many times over.

Q18. Are there any other projects that, in your view, should be short-listed? Please provide appropriate evidence wherever possible and refer to the short-listing criteria.

Yes. (1) The Minehead-Aberthaw reef project. See our own criteria evaluation here: <http://www.greenworldtrust.org.uk/Energy/ReefCompared.htm> (2) "Third Generation" tidal stream turbines eg <http://www.aquascientific.com/>. See the 16-page pdf evaluation by Stuart Ballard of Save Our Severn, available online at: <http://www.greenworldtrust.org.uk/Documents/3rd%20gen%20tidal%20turbines.pdf>

Chapter 5 - Strategic Environmental Assessment

Q19. Which plans, programmes or environmental protection objectives are most significant for this strategic-level environmental assessment?

Getting the cooperation of all users. We don't want the type of official-looking waffle you've given above, saying things like "things are being taken care of" because we don't believe you. You need much more basic language and you need to show you can match all interest groups' expertise. All your proposals would cause huge environmental changes and we want them spelled out, with relevant pictures. We want a forum where ongoing discussion can continue. And we want proof that we are actually being listened to, not just your say-so.

Q20. Is there any additional information that could help supplement the baseline data? Any further information relating to the baseline indicators, existing problems and trends over time would be very useful.

Canadian data (a) from the Bay of Fundy, especially regarding their disastrous (and unforeseen) silting problems, and (b) the environmental impact assessment for a larger barrier they did not build due to the risk of catastrophic flooding and environmental disruption. Instead of this official-looking study with pages of verbiage to work through, we want an ongoing website with relevant pictorial information on environmental issues, linked to a forum for discussion where interested parties can have a say and experience being heard.

Q21. Is there any important information that has not been addressed in view of the SEA scope?
(1) No studies of the Somerset coast and low-lying land below Cardiff-Brean (2) Studies of toxic colloidal sludge in the channel have not been taken into consideration (3) Has consideration been given to the history of toxic effluents from the Parrett and the Brue? (4) Unexploded bombs etc have been found quite recently despite the EA's protestations that they had seen to all that. (5) Earthquake proof - none of your shortlisted schemes are earthquake-proof but the alternatives we suggest are. There is a well-known seismic fault in the estuary. (6) Fish - only very slow-moving turbines, or separate units, are safe for fish. There is a risk of extinction of several species in the estuary. (7) almost certainly more issues - a Forum would enable more issues to come to light and be added.

Q22. Is the range of environmental problems, issues and receptors covered appropriate? Is the level of receptor sensitivity appropriate?

No it's not. You're not writing ordinary English that ordinary folk can understand. Neither are you disclosing the origins of your data so that the more technically minded and focussed interest groups can check. You're waffling and using words like "receptors" without explaining what they mean.

Q23. Is the methodology proposed appropriate for this strategic-level environmental assessment?

No, for reasons above.

Q24. Are there any major plans or projects that should be included in the assessment of cumulative effects?

Yes. (1) Busby report and low-level radiation campaign re.silt (2) undisclosed nuclear plans

Q25. Are there any changes that should be made to the proposed SEA objectives; including any consolidation of the objectives? Are there any other SEA objectives, assessment criteria or indicators that should be included?

Opening up the whole thing to an ongoing public dialogue with picture pages and a Forum. You need to rewrite the whole environmental assessment report in crystal-clear English, in online web pages, not a pdf format, and with relevant pictures, otherwise it looks as if you have deliberately used officialese, obfuscation, verbiage, and technical inaccessibility, to hide material from us.

Q26. Are the relevant aspects of sustainable development covered, if the SEA addresses the issues identified in this SEA Scoping Report?

We don't know unless the whole report is clearly rewritten.

Q27. Any further suggestions regarding the scope of the SEA and its proposed assessment of the shortlisted options?

As stated above: (1) we need a report that is understandable and accessible, that we can easily interact with (2) none of the options proposed are viable

Chapter 6 - Next Steps

Q28. Do you agree with the work plan, as outlined above? If not please specify any other areas to be studied?

No. None of the schemes are feasible in our firm opinion. You need to go back to the drawing board (1) to look at alternatives that hold a huge potential but need development funding (2) to rewrite the environmental assessment in plain English, with pictures, not in pdf but easily accessible online (3) establish a Forum - or underwrite ours.

About You

Q1. Name

Colin Rogers

Q2. Location

South West

Q3a. Organisation

Green World Trust

Q3b. I am responding on behalf of my organisation

Yes

Q3c. Sector

NGO

Uploaded responses

This user has not uploaded any responses.